

BRADLEY LAW FIRM
A PROFESSIONAL CORPORATION

MICHAEL D. BRADLEY
ATTORNEY AND COUNSELOR AT LAW

2 PARK AVENUE, 20TH FLOOR
NEW YORK, NY 10016
(212) 235-2089
FAX: (212) 878-8819
MBRADLEY@BRADLEYLAWFIRMPC.COM

August 18, 2021

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *United States vs. Sekou Simpson*
1:21-cr-00449 (PAE)**

Dear Judge Engelmayer:

I represent Sekou Simpson in the above-referenced matter, currently set for initial pretrial conference before this Court on August 19, 2021. The purpose of this letter is to respectfully request modification of bail. The Government consents to this request. Mr. Simpson has been detained on consent at Brooklyn Metropolitan Detention Center since his presentment on August 10, 2021. It is requested that Mr. Simpson be immediately released on a \$50,000 bond cosigned by one financially responsible person, bond paperwork to be completed within one week of release, with the following additional conditions: Pretrial Services supervision, as directed; travel restricted to the Southern and Eastern Districts of New York; surrender all travel documents; home detention enforced by location monitoring (defendant permitted to install the GPS equipment); seek and maintain employment; refrain from communication with codefendants outside the presence of counsel; mental health evaluation/treatment as directed; submit to initial urinalysis (if positive, drug testing/treatment as directed); and refrain from possession of firearms, destructive devices and other dangerous weapons. The defense submits that these conditions are more than sufficient to reasonably assure Mr. Simpson's appearance and the safety of the community.

The Court's time and attention to this matter are greatly appreciated.

Best,

Michael D. Bradley

GRANTED. An amended bond disposition sheet will issue. The Clerk of Court is requested to terminate the motion at Dkt. No. 34.

8/19/2021

SO ORDERED.


PAUL A. ENGELMAYER
United States District Judge